

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

MARY HURD BROWN,

Plaintiff,

**NOTICE OF MOTION TO
DISMISS THE COMPLAINT**

-against-

20 Civ. 2424 (VEC) (OTW)

NEW YORK CITY DEPARTMENT OF
EDUCATION,

Defendant.

-----X

PLEASE TAKE NOTICE, that upon the Memorandum of Law in Support of Defendant's Motion to Dismiss the Complaint, and upon all prior pleadings and proceedings held herein, Defendant, NEW YORK CITY DEPARTMENT OF EDUCATION will move this court before the Honorable Valerie E. Caproni, United States District Court at the United States Courthouse for the Southern District of New York, located at 40 Foley Square, New York, New York, at a date and time to be determined by the Court, for judgment in favor of Defendant pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint, and for such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, that pursuant to paragraph 6(A) of Honorable Valerie E. Caproni's Individual Practices in Civil Pro Se Cases, papers filed in opposition to this motion must be served and filed within four (4) weeks of the motion papers, in this case, and reply papers, if any, must be served and filed within two (2) weeks of receipt of opposition papers.

PLEASE TAKE FURTHER NOTICE, that Defendant respectfully requests a stay of discovery during the pendency of this motion.

Dated: Queens, New York
December 30, 2020

JAMES E. JOHNSON
Corporation Counsel of the
City of New York
Attorney for Defendant
100 Church Street, Room 2-300
New York, NY 10007-2601
(212) 356-2475

By: /s/ Ryan Nasim
Ryan Nasim
Assistant Corporation Counsel
rnasim@law.nyc.gov

TO:
MARY HURD BROWN
Pro Se Plaintiff
P.O. Box 1113
Bronx, NY 10451
(917) 583-6385
Mbrown39@verizon.net

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY HURD BROWN,

Plaintiff,

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION,

,

Defendant.

NOTICE TO DISMISS THE COMPLAINT

JAMES E. JOHNSON

Corporation Counsel of the City of New York

Attorney for Defendants

100 Church Street, Room 2-300

New York, New York 10007-2601

Of Counsel: Ryan Nasim

Tel: (212) 356-2475

rnasim@law.nyc.gov

Matter No.: 2020-038133

Due and timely service is hereby admitted.

New York, N.Y., 20__

.....

Attorney for.....